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Building The Wireless Future

Cellular Telecommunications Industry Association

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Michael F. Altschul

Vice President/General Counsel

March 2, 1999

Ms. Magalie R. Salas
Office of the Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
12th Street, Lobby, TW-A325
Washington, D.C. 20554

**Re: Ex Parte Presentation
CC Docket No. 94-102**

Dear Ms. Salas:

On February 19, 1999 CTIA submitted supplemental answers to questions posed by the Commission staff in connection with its assessment of the relative merits of alternate technical methods of completing 9-1-1 emergency calls over analog cellular networks. On February 24, 1999, CTIA resubmitted those materials, correcting a portion of the filing. In response to a request from the Commission and to further facilitate consideration of the merits of the wireless industry's Automatic A/B Roaming proposal, CTIA submits suggested language for incorporation into the FCC's rules regarding 9-1-1 call completion. CTIA's suggested language to 47 C.F.R. § 22.921, or in the alternative, to 47 C.F.R. § 20.18, is attached.

Pursuant to Section 1.1206 of the Commission's Rules, an original and one copy of this letter is being filed with your office. If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

Michael F. Altschul

cc: Mr. James D. Schlichting
Mr. Ronald Netro

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Amendment to 47 C.F.R. 22.921

§ 22.921 Automatic A over B Roaming / Intelligent Retry for 911 Service.

(a) As of November 15, 2000 (*or 18 months following the issuance of this order*), a licensee subject to the requirements of § 20.18 is prohibited from providing subscribers to its service an analog cellular mobile station that does not comply with the requirements of this section.

(b) Each analog cellular mobile station manufactured after November 15, 2000 must automatically perform the following Intelligent Retry functions when 9-1-1¹ is dialed and sent.

(1) When the subscriber dials 9-1-1, the analog cellular mobile station must initially attempt to complete the call using the strongest available control channel on the preferred carrier's network, provided that the "preferred carrier's network" means the analog cellular network belonging to the licensee for which the caller has subscribed for service. Such a call to 9-1-1 may not be blocked due to a class restriction such as, but not limited to, priority channel assignment or status of a prepaid calling card, etc

(2) If the call fails to complete when a 9-1-1 call attempt is made pursuant to subsection (b)(1), the analog cellular mobile station must automatically make a second attempt to complete the call by using the next strongest control channel on the preferred carrier's network, provided that to "complete the call" means to reach Conversation State as defined in ANSI TIA/EIA 553-A.

(3) If the call attempt fails again to complete when a 9-1-1 call attempt is made for the second time pursuant to subsection (b)(2), the analog cellular mobile station must automatically scan for the strongest available control channel on the network of the non-preferred carrier and must automatically attempt to complete the call on that carrier's network.

(4) Each call attempt enumerated in subsection (b), (1)-(3) shall be completed in a reasonable period of time but should not exceed 12 seconds.

(5) If all attempts on both the preferred carrier and non-preferred carrier are unable to complete (reach Conversation State) when a 9-1-1 call attempt is made, then the mobile station must automatically reinitiate the functions established in subsections (b), (1)-(4) until the call is completed, or for a preset number of times to be established by the manufacturer of the analog cellular mobile station, or the call is terminated by the caller.

(6) When the subscriber dials 9-1-1, the subscriber should be kept aware of the status of the call through some means of call progress feedback (i.e. audible tones, flashing light etc.) while the analog cellular mobile station performs the Intelligent Retry functions provided for in this section.

¹ " 9-1-1" refer to current bill and jurisdictional issues

(7) When the subscriber dials 9-1-1, the analog cellular mobile station must override all user programming options or features which prevent scanning of the non-preferred carrier's portion of cellular channels.

(8) Voice connection to emergency 9-1-1, using the process described in this section as *Automatic A/B Roaming / Intelligent Retry*, should be completed in a time period considered "reasonable" to the average caller but should not exceed 65 seconds.

Or

Amendment to 47 C.F.R. 20.18

(h) Automatic A over B Roaming / Intelligent Retry. All analog cellular mobile stations used by subscribers of a licensee covered by this section must be capable of scanning the frequencies of another licensee in those instances when a 9-1-1 call attempt is made and the call fails to be completed on the service provider's network, to the extent the analog cellular mobile station is manufactured after November 15, 2000.